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November 6, 2020

Via ECF Only

The Honorable Joan M. Azrack
United States District Judge for the
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: *Manuel Barrera, et al. v. Pepe Rosso 24 Inc. et al.*,
Docket No. 2:18-cv-04558-JMA-AYS

Dear Judge Azrack:

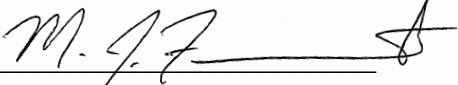
As the Court is aware, this office represents Plaintiffs Manual Barrera and Melvin Almendares in the above-referenced putative collective action arising under the Fair Labor Standards Act and the New York Labor Law against Defendants Pepe Rosso 24 Inc. d/b/a Pepe Rosso, Rosso Uptown, Ltd., d/b/a Rosso Uptown Pizzeria & Restaurant and/or Brick Osteria, Michael Tizzano, individually, and Massimo Gammella, individually (collectively as “Defendants”), which was commenced on August 13, 2018, and for which issue was joined on August 2, 2019. We write in accordance with the Court’s October 28, 2020 Order (Dkt. No. 40), directing Plaintiffs to file their response to Defendants’ counsel’s motion to withdraw as Defendants’ attorneys of record and for a thirty-day stay so that Defendants can secure new counsel.

Plaintiffs do not oppose counsel’s request to withdraw. However, Plaintiffs believe that a thirty-day stay from the date of the Court’s order granting that withdrawal would be excessive. Indeed, counsel filed the withdrawal motion on October 28, 2020, after informing the undersigned on October 16, 2020, of his intention to do so. Thus, Defendants have already had ample time to search for replacement counsel. In light of that, Plaintiffs submit that the Court should provide

Defendants ten days from the date of its Order to have new counsel enter an appearance on behalf of Defendants, or else the corporate defendants be deemed in default while the individual defendants be permitted to proceed *pro se*.

We thank the Court for its time and attention to this matter.

Respectfully submitted,


Matthew J. Farnworth, Esq.
For the Firm

C: Defendants' Counsel (*Via* ECF)